

File No.: 50098
MORTON & CRAIG, LLC
110 Marter Avenue
Suite 301
Moorestown, NJ 08057
(856)866-0100
Attorney for Santander Consumer USA Inc.
JM5630

UNITED STATES
BANKRUPTCY COURT FOR
THE DISTRICT OF NEW
JERSEY

IN RE:
CARLOS BENVENNUTTI, JR.
VERNICE L. TOLLIVER-BENVENNUTTI

CHAPTER 13
CASE NO: 18-28608(ABA)
HEARING DATE: 11-26-2019

NOTICE OF MOTION OF
SANTANDER CONSUMER
USA INC. TO MODIFY THE
AUTOMATIC STAY

To:

Carlos and Vernice Benvenutti
2402 Brandies Avenue
Cinnaminson, NJ 08077
Debtors

Brad J. Sadek, Esq.
1315 Walnut Street
Suite 502
Philadelphia, PA 19107
Attorney for the debtors

Isabel C. Balboa
Cherry Tree Corporate Center
535 Route 38, Suite 580
Cherry Hill, NJ 08002
Trustee

U.S. Trustee, US Dept of Justice
Office of the US Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

John R. Morton, Jr., Esquire, attorney for Santander Consumer USA Inc., has filed papers with the Court for relief from the automatic stay to permit Santander Consumer USA Inc. to repossess and sell the motor vehicle(s) described in the attached pleadings. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult with one.** If you do not want the Court to grant the relief sought, or if you want the Court to consider your views on the motion, then no later than seven (7) days before the hearing date, you or your attorney must:

File with the Court a written request for a hearing (or, if the Court requires a written response, an answer, explaining your position) at:

United States Bankruptcy Court
1 John F. Gerry Plaza
4th & Cooper Streets
Camden, NJ 08101

If you mail your (request) (response) to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

John R. Morton, Jr., Esquire
110 Marter Avenue, Suite 301
Moorestown, NJ 08057

TAKE FURTHER NOTICE that the facts movant relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion, and TAKE FURTHER NOTICE that oral argument is hereby not requested.

Attend the hearing scheduled to be held on November 26, 2019 at 10 a.m. in Courtroom #4B, United States Bankruptcy Court, 1 John F. Gerry Plaza, 4th & Cooper Streets, Camden, New Jersey 08101.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order.

Date: 10-30-2019

/s/ John R. Morton, Jr., Esquire

John R. Morton, Jr., Esquire

Attorney for Santander Consumer USA Inc.